## Ex Parte Communication - Filed Via ECFS

October 18, 2019

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

Re: In the Matter of Transforming the 2.5 GHz Band, WT Docket No. 18-120; Tribal

**Priority Filing Window** 

Dear Ms. Dortch:

The National Tribal Telecommunications Association (NTTA) submits this Ex Parte communication in regard to the timing of the Tribal priority window discussed in the *Report and Order* adopted in the above-captioned proceeding (FCC 19-62, rel. July 11, 2019, see ¶60). In the *Report and Order*, the Commission directed the Wireless Telecommunications Bureau (WTB) to "announce procedures for the Tribal priority window through one or more Public Notices and other appropriate outreach to potentially eligible Tribal applicants", which would presumably include the notice period prior to opening the priority filing window and the length of time the actual filing window will be open.

NTTA supports the position expressed in Senator Kyrsten Sinema's October 17, 2019 letter to Chairman Ajit Pai that urges the Commission to "open the priority window for Tribes for 180 days for education and application purposes." NTTA assumes the 180-day period applies to the amount of time the Tribal priority window remains open, and that the WTB will still issue a Public Notice with a given period of time prior to the window opening (the *Report and Order* mentions a 90-day notice period).

Adopting a Tribal priority window that provides interested Tribal or Tribally-related entities 180 days to properly consider obtaining the 2.5 Ghz spectrum made available will be vital in ensuring the best use of this spectrum in Tribal areas for the purpose of addressing, in one of many ways, the digital divide that currently exists between Tribal areas and the rest of the United States.

Sincerely,

Godfrey Enjady, President National Tribal Telecommunications Association